

## **REMARKS / ARGUMENTS**

This Amendment and Response to Office Action is filed in response to the Office Action of August 17, 2004. Presently, claims 28-32 are allowed. Claims 19-27 stand rejected under 35 U.S.C. § 112, ¶ 2, as being indefinite because claim wording with respect to "-baking" (in claim 19) appears unclear, and limitations of "reversed trapezoid shape" (in claim 25) and "trapezoid shape" (in claim 27) lack proper antecedent bases. Claims 4-6 and 13 and 15 respectively stand rejected under U.S.C. § 112, ¶ 2 for the same reasons as claims 19-27 and 25 and 27. In addition, claims 1, 3 and 7-8 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,351,066 issued to Gyoutoku et al. ("Gyoutoku"). Furthermore, the specification and the drawings stand objected due to minor informalities. The foregoing objections and rejections are traversed/overcome for at least the following reasons.

### **I. Claim Allowance**

The Applicants are pleased to acknowledge that claims 28 and 29 are allowed. In this filing, these claims have been amended for clarification purposes without adding or removing features. It is believed that these modifications do not affect the patentability of claims 28 and 29. Accordingly, the entry of the amendments in allowed claims 28 and 29 is respectfully requested.

### **II. Objection to the Drawings and Specification**

The drawings stand objected because the figures 2A-2F corresponding to the description of the prior art are not marked up with the legend "Prior Art". The accompanying drawing amendment sheets correct this omission. Accordingly, withdrawal of the drawing objection is

respectfully requested.

The specification also stands objected because it is alleged to contain an unclear description with respect to the "baking process" performed on the non-photosensitive insulating material. The specification has been amended to clarify that two baking processes are applied to the non-photosensitive insulating material: a first baking process is performed to remove the presence of solvent in the non-photosensitive material; to accomplish a cross-linking process, a second baking process is subsequently conducted at a temperature between 120-180 Celsius degrees for 20 minutes to 1 hour to imidize the non-photosensitive insulating material 320. See the amended paragraph above (in this Response) for page 9, lines 15-23 of the patent specification. The Applicants submit that this amendment explicitly reciting the two baking processes is fully disclosed in the original specification, and thus does not add new matter. Accordingly, withdrawal of the specification objection is respectfully requested.

### **III. Rejection Of Claims 4-6, 13, 15, 19-27 Under U.S.C. § 112, ¶ 2**

Claims 4-6 and 19-27 stand rejected under 35 U.S.C. § 112, ¶ 2 as allegedly indefinite in respect of the feature "-baking". In addition, claims 13, 15, 25, and 27 stand rejected due to an insufficient antecedent basis in respect of the claim elements "trapezoid shape" and "reversed trapezoid shape".

The Applicants submit that these rejections are overcome by ways of the claim amendments set forth herein. Grant of allowable claims 19-27 thus is requested.

### **IV. Rejection Of Claims 1, 3 and 7-8 as Being Anticipated by Gyoutoku**

Claims 1, 3 and 7-8 stand rejected under 35 U.S.C. § 102(e) as being allegedly

anticipated by Gyoutoku. The Applicants respectfully traverse the anticipation rejection because Gyoutoku fails to disclose each and every feature of the amended claims.

Amended claim 1 recites a method for manufacturing an organic electroluminescent display which comprises, *inter alia*, applying a cross-linking process to a non-photosensitive insulating layer formed on the substrate. Gyoutoku is silent and fails to teach or suggest performing any cross-linking process as recited in amended claim 1. For at least the foregoing reason, the Applicants submit that the rejection of claim 1, 3 and 7-8 has been traversed. Accordingly, allowance of these claims is respectfully requested. By virtue of their dependency on patentable claim 1, dependent claims 2, 4-6 and 9-18 should also be patentable over the cited prior art.

In addition, new claims 33-36 are presented herein to cover additional scopes of the invention. Consideration and allowance of these claims are respectfully requested.

### CONCLUSION

For at least the foregoing reasons, it is believed that all of pending claims 1-36 of the present application patently define over the prior art and are in proper condition for allowance. If the Examiner believes that a telephone conference would expedite the examination of the above-identified patent application, the Examiner is invited to call the undersigned. If additional fees are required to complete this filing, the Commissioner is authorized to deduct from Deposit Account 13-0480, Attorney Docket No. 87141181.242002.

An associate power of attorney and change of correspondence address (patent application) is enclosed with the filing of this response. Please forward all future correspondence to the address associated with customer number 23562 as follows: